

# Furgang & Adwar, L.L.P.

COUNSELORS IN INTELLECTUAL PROPERTY AND ENTERTAINMENT LAW

April 11, 2023

Hon. John Koeltl  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

APPLICATION GRANTED  
SO ORDERED

*John G. Koeltl*  
4/11/23 John G. Koeltl, U.S.D.J.

RE: Gym Door Repairs, Inc. v. Young Equipment Sales, Inc.  
Docket No. : 15-CV-4244  
Our File No. : 11261

Dear Judge Koeltl:

We represent former defendants Qpala Enterprises, Inc. (d.b.a. Guardian Gym Equipment), and James Petriello (the "Guardian Parties").

On April 7, 2023, we requested Magistrate-Judge Wang to grant an extension of time of two (2) weeks, to expire on April 28, to file any Objection to Judge Wang's March 31, 2023, Report and Recommendation ("R&R") [Dckt 1044]. (See our application at Docket 1045). We stated that the length, complexity, and detailed nature of the issues raised in the R&R require both factual and legal research that we cannot complete by the current due date of April 14.

A further reason for this requested enlargement and its urgency (which we did not discuss in our original application to the Magistrate-Judge) was that I underwent major eye surgery on December 9, 2022, to correct the loss of eyesight in my right eye. My recovery has been very slow and this, too, has made it difficult to deal with the R&R.

We have received no response and in an abundance of caution, because we simply will not be able to complete all necessary tasks to file any objections by the present deadline, we

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hereby make this application for an extension of time to file any objection to the R&R, such extension to expire on April 28, 2023.

We thank the Court for its consideration.

Respectfully submitted,  
FURGANG & ADWAR, L.L.P.

/Philip Furgang/  
PHILIP FURGANG (PF-5654)

PF:sb

cc:

to all parties of record via ECF